

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION IN COMPLIANCE WITH COURT ORDER

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Department, through the undersigned counsel, and respectfully allege and pray as follows:

1. On August 1, 2016, this Honorable Court issued a Transition Order to mitigate and prevent any undue interruption in operations or abrupt turnover in personnel that is likely to set back the Commonwealth's efforts to implement key civil rights reforms at PRPD. (See Docket No. 388)

2. Specifically, this Honorable Court ordered that the Commonwealth shall promptly notify the Court, the TCA, and the United States whenever there is a vacancy, for any reason, in positions or professional service contracts designated as critical in the Reform Unit or SAEA, pursuant to Paragraph 233 of the Agreement. (See Docket No. 388, p.5)

3. Pursuant to Paragraph 233 of the Agreement the PRPD has made its best efforts to retain personnel in the Reform Unit to ensure continuity by securing resources. However, in compliance with the aforementioned court order, the Commonwealth informs that a vacancy has occurred in the Reform Unit. Attorney Alice M. Morales Roldan has sought new employment outside the PRPD. Currently, the PRPD is identifying new staffing to fill the vacant position in order to ensure continuity of effort and a successful implementation of the reform agreement.

4. Additionally, the PRPD informs the court that several personnel changes have occurred in the SAEA division. However, all vacated positions have been replaced with new personnel in order to secure stability in the reform process. (See Exhibit 1)

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this February 22nd, 2017.

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Acting Deputy in Charge of
General Litigation

SUSANA PENAGARICANO BROWN
Acting Director of Federal Litigation
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S/JOEL TORRES ORTIZ

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